

Message

From: Malagon, Hector [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=78E2A0B23A3044CD98F14A76088DCF9D-MALAGON, HE]
Sent: 9/19/2018 7:49:15 PM
To: Muneer, Alie [muneer.alie@epa.gov]
Subject: RE: P-18-0169 PPE question

This is an example of the language used in a SNUR requiring respirator:

"(i) Protection in the workplace. Requirements as specified § 721.63(a)(1), (a)(2)(i), (iii), (iv), (a)(3), (a)(4), (a)(5)(respirators must provide a National Institute for Occupational Safety and Health with assigned protection factor of at least 50), when determining which persons are reasonably likely to be exposed as required for §721.63(a)(1) and (4), engineering control measures (e.g., enclosure or confinement of the operation, general and local ventilation) or administrative control measures (e.g., workplace policies and procedures) shall be considered and implemented to prevent exposure where feasible), (a)(6)(v), (vi), (particulate), (combination of gas/vapor and particulate) and (c)."

From: Muneer, Alie
Sent: Wednesday, September 19, 2018 2:26 PM
To: Malagon, Hector <Malagon.Hector@epa.gov>
Subject: RE: P-18-0169 PPE question

I'll stop by at 3pm. They didn't claim CBI on submitter name or technical name on their submission so I believe it's okay.



Alie Muneer

USEPA Headquarters | OCSPP OPPT Chemical Control Division | WJC Building-East | 1200 Pennsylvania Avenue, N. W. |
Mail Code: 7405M | Washington, DC 20460 | Ph# 202 564 6369 | Fax: 202 564 9490 | Email: muneer.alie@epa.gov | Office hours:
M-F, 8am to 4:30pm

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From: Malagon, Hector
Sent: Wednesday, September 19, 2018 2:17 PM
To: Muneer, Alie <muneer.alie@epa.gov>
Subject: RE: P-18-0169 PPE question

Hi Alie
Is 3:00 pm Ok for you?


One more thing, be careful when you use admin email because you cannot put CBI information in here. I have not checked the cases mentioned below; but if they are claiming submitter ID or technical contact ID CBI (in the submission), once they put here both (PMN number and theirs identities) that would be considered CBI disclosure.

Hector Malagon
Environmental Protection Specialist

U.S. EPA, Office of Pollution Prevention and Toxics
Chemical Control Division
New Chemicals Management Branch,
WJC-East, Room: 4133k, Mail Code: 7405M
Phone: 202-564-0535
Fax: 202-564-9490

From: Muneer, Alie
Sent: Wednesday, September 19, 2018 1:51 PM
To: Malagon, Hector <Malagon.Hector@epa.gov>
Subject: FW: P-18-0169 PPE question

What time is a good time to stop by your desk to discuss the red text in below email?

 **Alie Muneer**
USEPA Headquarters | OCSPP OPPT Chemical Control Division | WJC Building-East | 1200 Pennsylvania Avenue, N. W. |
Mail Code: 7405M | Washington, DC 20460 | Ph# 202 564 6369 | Fax: 202 564 9490 | Email: muneer.alie@epa.gov | Office hours:
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From: Kevin Gauthier <KGauthier@hauthaway.com>
Sent: Wednesday, September 19, 2018 1:43 PM
To: Muneer, Alie <muneer.alie@epa.gov>
Cc: Christopher Reuther <creuther@hauthaway.com>; John Zermani <JZermani@hauthaway.com>; Ted Johnson <TJohnson@hauthaway.com>
Subject: RE: P-18-0169 PPE question

Hello Alie,

Please see our comments in red below.

Regards,

Kevin

From: Muneer, Alie [<mailto:muneer.alie@epa.gov>]
Sent: Wednesday, September 19, 2018 8:37 AM
To: Kevin Gauthier <KGauthier@hauthaway.com>
Cc: Christopher Reuther <creuther@hauthaway.com>
Subject: RE: P-18-0169 PPE question

Is there a status update to this?

From: Muneer, Alie
Sent: Monday, September 17, 2018 4:16 PM

To: 'Kevin Gauthier' <KGauthier@hauthaway.com>
Cc: Christopher Reuther <creuther@hauthaway.com>
Subject: RE: P-18-0169 PPE question

Kevin: The stipulations are:

- Use of dermal protection (including impervious gloves) Agree
- Use of respiratory protection (NIOSH certified respirator with APF 1000 for spray applications and APF 50 for no spray applications) As the manufacturer of this product we do not engage in the application process of this material. We currently use APRs with an APF of 10 in concert with active ventilation for the manufacturing of our products where industrial hygiene monitoring requires. It is imperative in order to maintain compliance with OSHA standards to evaluate hazards and approach the mitigation of each first with engineering controls and administrative controls before relying on personal protective equipment.
- No consumer use We would like you to clarify “consumer use”, we are manufacturing this for industrial sales and use.
- Manufacturing (including import) the PMN substance with triethylamine concentration no greater than 4% by weight Agree
- APF 1000 for spray applications (please see bullet 2)
- APF 50 for no-spray applications (please see bullet 2)



Alie Muneer

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